



PSE&G Public Service
Electric and Gas
Company

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Robert L. Mittl General Manager
Nuclear Assurance and Regulation

July 30, 1984

Director of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
7920 Norfolk Avenue
Bethesda, MD 20814

Attention: Mr. Albert Schwencer, Chief
Licensing Branch 2
Division of Licensing

Gentlemen:

HOPE CREEK GENERATING STATION
DOCKET NO. 50-354
COMPLIANCE WITH REGULATORY GUIDE 1.84

Public Service Electric and Gas Company (PSE&G) submits the attached detailed design data on the use of Code Case N-192, as required by Regulatory Guide 1.84. This design data demonstrates compliance with Paragraph NC/ND-3649 of ASME Section III.

This information is considered to be proprietary and is to be withheld from public disclosure, as indicated in the attached affidavit.

Should you have any questions in this regard, please contact us.

Very truly yours,

NOTE: NRC PDR } NON
LPDR } PROP
NSIC } ONLY
NTIS }

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A PDR

The Energy People

Director of Nuclear
Reactor Regulation

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7/30/84

C D. H. Wagner (w/attach)
USNRC Licensing Project Manager

W. H. Bateman (w/o attach)
USNRC Senior Resident Inspector

KI 12 01/02



METAL BELLOWS CORPORATION (MBC)

AFFIDAVIT

I, Paul B. Campbell, being duly sworn, depose and state as follows:

1. I am Corporate Vice President, Engineering, and have been delegated the function of reviewing the information described in paragraph 2 which is sought to be withheld and has been authorized to apply for its withholding.
2. The material sought to be withheld is:
 - CR 364 Report, Hose Assembly, Flexible Metal Instrumentation, including Addendum I
 - CR 429 Allowable Installation Configuration for MBC P/N 73989
 - CR 431 Stress Report for MBC P/N 73989
 - CR 434 Documentation of Compliance for MBC P/N 73989
 - CR 709 Design Report
 - CR 710 Documentation of Compliance
 - CR 719 Design Report
 - CR 720 Documentation of Compliance
 - CR 725 Report, Hose Assembly, Flexible Metal, Instrumentation
 - CPS 3043 Weld Specification for Nuclear Components
 - CPS 3098 General Cleaning Procedure for Cleaning and Packaging Nuclear Components
 - CPS 3118 Procedure and Control for Penetrant Inspection
 - CPS 3187 General Acceptance Test Procedure for Nuclear Items, including Attachment I
 - CPS 3197 Cleaning, Packaging, and Shipping Procedure for Nuclear Components
 - CPS 3208 Minimum Wall Thickness Verification Procedure for Formed Bellows
 - CPS 3210 Identification Marking of Parts and Assemblies

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78012	Hose Assembly - 1" IPS Drawing
78013	Hose Assembly - 1 1/2" IPS Drawing
78014	Hose Assembly - 2" IPS Drawing
78040	Hose Assembly - 8" Diameter Drawing
78528	Hose Assembly - Flexible Metal per ASME Section III, Class 2 & 3
A006	QW-482, Welding Procedure Specification including Supplements I and II
A006	QW-483, Procedure Qualification Record
A012	QW-482, Welding Procedure Specification
A012	QW-483, Procedure Qualification Record
A012	Supplement
A029	QW-482, Welding Procedure Specification
A029	QW-483, Procedure Qualification Record
A029	Supplement
A030	QW-482, Welding Procedure Specification
A030	QW-483, Procedure Qualification Record
A030	Supplement
A034	QW-482, Welding Procedure Specification
A034	QW-483, Procedure Qualification Record
A034	Supplement
IM 77598	Instruction Manual - Installation, inspection and handling for hose assembly, flexible metal per ASME Section III, Class 2
IM 77600	Instruction Manual, Installation, Inspection, Storage and Handling for Hose Assembly - Floating Flange Connection.
Q.A. Manual	Quality Assurance Nuclear Manual
DT-068-18	Ultrasonic Examination

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DT-068-19 Radiographic Examination

DT-068-20 Magnetic Particle Examination

3. In designating material as proprietary, MBC utilizes the definition of proprietary information and trade secrets set forth in the American Law Institute's Restatement Of Torts, Section 757. This definition provides:

"A trade secret may consist of any formula, pattern, device, or compilation of information which is used in one's business and which gives him an opportunity to obtain an advantage over competitors who do not know or use it... A substantial element of secrecy must exist, so that, except by the use of improper means, there would be difficulty in acquiring information.... Some factors to be considered in determining whether given information is one's trade secret are: (1) the extent to which the information is known outside of his business; (2) the extent to which it is known by employees and others involved in his business; (3) the extent of measures taken by him to guard the secrecy of the information; (4) the value of the information to him and to his competitors; (5) the amount of effort or money expended by him in developing the information; (6) the ease or difficulty with which the information could be properly acquired or duplicated by others."

4. Some examples of categories of information which fit into the definition of proprietary information are:
- a. Information that discloses a process, method, or apparatus where prevention of its use by nuclear metallic hose competitors without license from MBC constitutes a competitive economic advantage over other companies;
 - b. Information consisting of supporting data and analyses, including test data, relative to a process, method, or apparatus, the application of which provide a competitive economic advantage, e.g., by optimization or improved marketability;
 - c. Information which if used by a competitor, would reduce his expenditure of resources or improve his competitive position in the design, manufacture, shipment, installation, assurance or quality or licensing of a similar product;
 - d. Information which reveals cost or price information, production capacities, budget levels or commercial strategies of MBC, its customers or suppliers;
 - e. Information which reveals aspects of past, present, or future MBC customer-funded development plans and programs or potential commercial value to MBC;



- f. Information which discloses patentable subject matter for which it may be desirable to obtain patent protection;
 - g. Information which MBC must treat as proprietary according to agreements with other parties.
5. In addition to proprietary treatment given to material meeting the standards enumerated above, MBC customarily maintains in confidence preliminary and draft material which has not been subject to complete proprietary, technical, and editorial review. This practice is based on the fact that draft documents often do not appropriately reflect all aspects of a problem, may contain tentative conclusions, and may contain errors that can be corrected during normal review and approval procedures. Also, until the final document is completed it may not be possible to make any definitive determination as to its proprietary nature. MBC is not generally willing to release such a document to the general public in such a preliminary form. Such documents are however, on occasion furnished to the NRC staff on a confidential basis because it is MBC's belief that it is in the public interest for the staff to be promptly furnished with significant or potentially significant information. Furnishing the document on a confidential basis pending completion of MBC internal review permits early acquaintance of the staff with the information while protecting MBC's potential proprietary position and permitting MBC to insure the documents are technically accurate and correct.
 6. Initial approval of proprietary treatment of a document is made by the Subsection Manager of the originating component, the man most likely to be acquainted with the value and sensitivity of the information in relation to industry knowledge. Access to such documents within the Company is limited on a "need to know" basis and such documents at all times are clearly identified as proprietary.
 7. The procedure for approval of external release of such a document is reviewed by the Section Manager, Project Manager, Principal Scientist or other equivalent authority, by the Section Manager of the cognizant Marketing function (or his delegate) and by the Legal Operation for technical content, competitive effect and determination of the accuracy of the proprietary designation in accordance with the standards enumerated above. Disclosures outside MBC are generally limited to regulatory bodies, customers and potential customer and their agents, supplier, and licensees only in accordance with appropriate regulatory provisions or proprietary agreements.
 8. The documents mentioned in paragraph 2 above have been evaluated in accordance with the above criteria and procedures and have been found to contain information which is proprietary and which is customarily held in confidence by MBC.

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9. The materials mentioned in Paragraph 2 above provide a detailed discussion of both the philosophy and methodology used by MBC in nuclear metallic hose for safety related equipment and as such are considered to contain commercially sensitive information. This information is handled as proprietary by

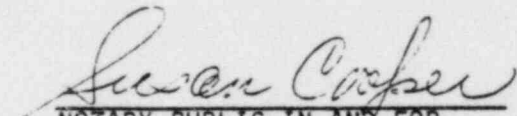
Metal Bellows Corporation
Chatsworth, California

Paul B. Campbell, being duly sworn, deposes and says that he has read the foregoing affidavit and the matters stated therein are true and correct to the best of his knowledge, information, and belief.

Executed at Chatsworth, California, this 2nd day of March 1984,


Paul B. Campbell

Subscribed and sworn before me this 2nd day of March 1984.


NOTARY PUBLIC IN AND FOR
SAID COUNTY AND STATE



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Attachment 4.0